

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY**
Caption in Compliance with D.N.J. LBR 9004-1(b)

GENOVA BURNS LLC

Daniel M. Stolz, Esq.
Donald W. Clarke, Esq.
Gregory S. Kinoian, Esq.
dstolz@genovaburns.com
dclarke@genovaburns.com
gkinoian@genovaburns.com
110 Allen Road, Suite 304
Basking Ridge, NJ 07920
Tel: (973) 533-0777
Fax: (973) 533-1112
Proposed Local Counsel for the Official Committee of Talc Claimants

BROWN RUDNICK LLP

David J. Molton, Esq.
Robert J. Stark, Esq.
Michael S. Winograd, Esq.
Eric R. Goodman, Esq.
dmolton@brownrudnick.com
rstark@brownrudnick.com
mwinograd@brownrudnick.com
egoodman@brownrudnick.com
Seven Times Square
New York, NY 10036
Tel: (212) 209-4800
Fax: (212) 209-4801

And

Jeffrey L. Jonas, Esq.
Sunni P. Beville, Esq.
jjonas@brownrudnick.com
sbeville@brownrudnick.com
One Financial Center
Boston, MA 02111
Tel: (617) 856-8200
Fax: (617) 856-8201
Co-Counsel for the Official Committee of Talc Claimants

MASSEY & GAIL LLP

Jonathan S. Massey, Esq.
Rachel S. Morse, Esq.
jmassey@masseygail.com
rmorse@masseygail.com
1000 Maine Ave. SW, Suite 450
Washington, DC 20024
Tel: (202) 652-4511
Fax: (312) 379-0467
Proposed Co-Counsel for the Official Committee of Talc Claimants

OTTERBOURG PC

Melanie L. Cyganowski, Esq.
Jennifer S. Feeney, Esq.
Michael R. Maizel, Esq.
mcyganowski@otterbourg.com
jfeeney@otterbourg.com
mmaizel@otterbourg.com
230 Park Avenue
New York, NY 10169
Tel: (212) 905-3628
Fax: (212) 682-6104
Proposed Co-Counsel for the Official Committee of Talc Claimants

In re:

LTL MANAGEMENT, LLC,¹
Debtor.

Chapter 11

Case No.: 23-12825 (MBK)

Honorable Michael B. Kaplan

¹ The last four digits of the Debtor's taxpayer identification number are 6622. The Debtor's address is 501 George Street, New Brunswick, New Jersey 08933.

**CERTIFICATION OF HON. ROYAL FURGESON (RET.), EXPERT WITNESS
TO THE OFFICIAL COMMITTEE OF TALC CLAIMANTS FOR
THE FINAL ALLOWANCE FEES**

Hon. Royal Furgeson (ret.), Expert Witness to the Official Committee of Talc Claimants (“TCC”), respectfully states to the Court as follows:

1. On April 4, 2023, the Debtor filed a Chapter 11 Petition with the United States Bankruptcy Court for the District of New Jersey [dkt #1].
2. On April 14, 2023, an Order was entered Appointing the Official Committee of Talc Claimants [dkt #162]. Hon. Royal Furgeson was retained to serve as Expert Witness by Order of this Court dated June 15, 2023 [dkt #794], which retention was effective May 19, 2023. A copy of such retention Order is annexed hereto as Exhibit "A".
3. The within Application represents Hon. Furgeson's First and Final Application as expert witness to the TCC and covers the period May 19, 2023 through August 11, 2023.
4. Annexed hereto and made part hereof as Exhibit "B" are copies of Hon. Furgeson's time sheets. These detail the services rendered by Hon. Furgeson, the hourly rate charged, and the actual time expended in the performance of such services. Said time sheets reflect that Hon. Furgeson has expended 94.40 hours in performing services for TCC, resulting in charges of \$94,400.00.
5. Annexed hereto and made part hereof as Exhibit "C" is a detailed breakdown of all out of pocket disbursements incurred by Hon. Furgeson in the performance of its duties as expert witness to TCC, which total \$94,400.00.
6. A Monthly Fee Statements was prepared and served pursuant to the Administrative Fee Order Establishing Procedures for Allowance of Interim Compensation and Reimbursement of Expenses of Professionals, entered on May 22, 2023.

Date	Fees	Less 20%	Fee Payment Requested	Expense Reimbursement (100%)
May 19-June 30, 2023	\$94,400.00	(\$18,880.00)	\$75,520.00	\$1,960.82

7. During the period covered by the within fee application, your applicant continued to perform a variety of services for the creditors of the within Chapter 11 bankruptcy estate.

8. During the period covered by this First and Final Fee Application, your applicant performed research and other duties in preparation for Court appearance, and also appeared in Court to testify on behalf of the Talc Claimants Committee (“TCC”).

WHEREFORE, Hon. Royal Furgeson (ret.) respectfully requests the entry of the annexed Order, granting a final allowance of compensation in the amount of \$94,400.00, together with reimbursement of actual out-of-pocket disbursements in the amount of \$1,960.82, for a total award of \$96,360.82.

Respectfully submitted,

By: /s/ Hon. Royal Furgeson (ret.)
HON. ROYAL FURGESON (RET.)

Dated: August 29, 2023